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**OHIO EPA COMMENTS ON PSPS FOR
OPERABLE UNIT 5**

10/21/93

**OEPA/DOE-FN
2
COMMENTS**



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

October 21, 1993

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

The purpose of this letter is to provide approval or conditional approval to the revised O.U. 5 PSP's. Where comments are provided these will serve as conditions for approval. DOE should provide responses to these comments.

1. PSP for Trap Range - approved
2. PSP for Pilot Plant Drainage Ditch Seepage and Surface Water Background Investigation - approved
3. PSP for Snapshot Monitoring Well Sampling and Surface Water and Sediment Sampling - approved
4. PSP for Surface and Subsurface Soil Sampling
 - A. Response to OEPA Comment #2: The response states the referenced soil piles are in the area of CRU3 and have been placed there by the Waste Management Program. Regardless of where the soils are located, the characterization of these soils is the responsibility of OU5. These soils must be addressed within the OU5 RI. The fact that the Waste Management Program placed these soils is of little consequence unless substantial characterization was conducted at the time of placement. It is probable that some materials were placed into this area prior to RA17 being approved and thus the screening levels used and contaminant concentrations are uncertain. DOE must address the characterization of these soils within OU5.

B. DOE should address soil piles visible on aerial photos approximately 200 yards east of the northeast corner of the production area. Ohio EPA's concern with these piles has been previously voiced at meetings with DOE.

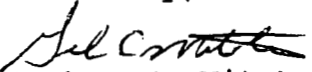
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5. PSP for Sampling Ground and Surface Water
 - A. Response to Ohio EPA Specific Comment #1: DOE's response to this comment is unacceptable. The response implies that the location could not be sampled due to the timeliness of Ohio EPA comments. DOE submitted the PSP on 6/10/93, Ohio EPA provided comments (6/17/93, and DOE responded on 8/24/93). If a delay is to be blamed for the missed sample, it lies with DOE for not submitting the PSP in May as scheduled. These locations should be incorporated into the sampling as soon as sufficient water is present.
 - B. Response to Ohio EPA Specific Comment #8: It is unclear how DOE "formally evaluated to determine if RCRA wastes would be generated". It would seem reasonable that ground water sampling from within an isolated Hazardous Waste Management Unit, where listed wastes were disposed and have been detected in ground water (e.g., Sewage Treatment Plant and Fire Training Facility), would generate a listed hazardous waste. DOE should re-evaluate its methodology for determining wells which may generate hazardous waste. Additionally, what has happened to the purge water from such areas to date?
6. PSP for Additional Monitoring Well Installation and Abandonment:
 - A. Response to Ohio EPA Specific Comment #8: It is unclear how DOE "formally evaluated to determine if RCRA wastes would be generated". It would seem reasonable that ground water sampling from within an isolated Hazardous Waste Management Unit, where listed wastes were disposed and have been detected in ground water (e.g., Sewage Treatment Plant), would generate a listed hazardous waste. DOE should reevaluate its methodology for determining wells which may generate hazardous waste. Additionally, what has happened to the purge water from such areas to date?

If you should have any questions please feel free to contact Tom Schneider or me at (513) 285-6357.

Sincerely,


Graham E. Mitchell
Project Manager

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Kurt Kollar, DERR
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Ken Alkema, FERMCO
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Jean Michaels, PRC
Robert Owen, ODH